

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

AMG
5/31/24

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)Premises known as 301 Dennis Street, Trailer 186, Edmond,
Oklahoma 73003 the surrounding curtilage, and
any vehicles, garages, and outbuildings thereon

Case No. M-24- 483 -AMG

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A.

located in the Western District of Oklahoma, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 922(a)(4)	Transporting Prohibited Weapons Without a License
18 U.S.C. § 922(o)	Possession of a Machinegun

The application is based on these facts:

See attached Affidavit of Joshua Dickson, Special Agent, HSI

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

JOSHUA DICKSON, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/31/2024City and state: Oklahoma City, Oklahoma

Judge's signature

AMANDA MAXFIELD GREEN, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**IN THE MATTER OF THE SEARCH
OF A RESIDENCE LOCATED AT:
301 Dennis Street, Trailer 186,
Edmond, Oklahoma 73003**

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Joshua Dickson, being duly sworn, depose and state the following:

1. I am a Special Agent with Homeland Security Investigations (HSI). I have been a Special Agent with HSI since May 2022, and I am an investigative or law enforcement officer within the meaning of 18 U.S.C. § 2510(7). Prior to my employment with HSI, I was employed as a Border Patrol Agent with the United States Border Patrol for five years. In total, I have completed approximately twenty-four weeks of specialized training at the Federal Law Enforcement Training Center located in Glynco, Georgia, and Artesia, New Mexico. I am currently assigned to the HSI office in Oklahoma City, Oklahoma, (hereinafter "HSI Oklahoma City") and am authorized to conduct criminal investigations of violations of United States laws and to execute warrants under the authority of the United States. As a Special Agent, I have been involved in a wide variety of investigative matters, including investigations targeting the unlawful possession of firearms and machinegun

conversion devices in violation of the Gun Control Act of 1968, as amended (18 U.S.C. §§ 921 et seq.). As part of my investigations, I have executed search and arrest warrants, analyzed records documenting the shipment of machinegun conversion devices, and discussed with other local and federal law enforcement officers how individuals illegally obtain, manufacture, and store firearms and machinegun conversion devices.

2. I am currently investigating **Emanuel Lopez (LOPEZ)** for, *inter alia*, transporting prohibited weapons without a license in violation of 18 U.S.C. § 922(a)(4), and possessing machineguns in violation of 18 U.S.C. § 922(o). I am submitting this Affidavit in support of a search warrant authorizing a search of a residence located at **301 Dennis Street, Trailer 186, Edmond, Oklahoma 73003** (hereinafter the **PREMISES**), as further described in **Attachment A**, which is incorporated into this Affidavit by reference, for all items described in **Attachment B** hereto, wherever they may be found, and to seize all items in **Attachment B** as instrumentalities, fruits, and evidence of the aforementioned crimes.

3. Because this Affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me regarding this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to support the issuance of a search

warrant. The information contained in this Affidavit is based upon my personal knowledge and observations, my training and experience, conversations with other law enforcement officers, and my review of documents and records.

PROBABLE CAUSE

4. On May 7, 2024, Customs and Border Protection (CBP) at the Los Angeles International Mail Facility notified HSI of a parcel traveling through international mail that was inspected and found to contain a machinegun conversion device. The parcel was addressed to "Manny L" at the **PREMISES** and was shipped from:

Shenzhen Sunyou Cross Border L
Room 19E BLDG A, Zhongmei Rd,
Longhua Shenzhen, China.

The parcel was declared as "auto part, radio broadcast receiver, FM or AM/FM only" on the shipping manifest.

5. On May 9, 2024, CBP Los Angeles notified HSI Oklahoma City of another shipment destined for "Manny L" at the **PREMISES**. This parcel was inspected and found to contain a machinegun conversion device. The parcel was shipped from:

Shenzhen Sunyou Cross Border L
Room 19E BLDG A, Zhongmei Rd,
Longhua Shenzhen, China.

The parcel was declared as an “auto part” on the shipping manifest.

6. On May 17, 2024, CBP was conducting inspections at the DHL International Mail Facility and intercepted a shipment containing a machinegun conversion device destined to "Manny L" at the **PREMISES**, shipped from:

Chunshueng International Industrial
165-171 Wan Chai Rd,
Lucky Centre, RM 1512
Hong Kong, China.

The parcel was declared as “hardware accessories” on the shipping manifest.

7. On May 21, 2024, CBP Oklahoma City observed through law enforcement records checks that another shipment destined to “Manny L” was due to travel through the CBP Los Angeles Port of Entry from China. CBP Oklahoma City notified HSI Oklahoma City of the shipment.

8. Using Oklahoma State driver's license records, HSI Oklahoma City identified "Manny L" as: **“Emanuel Lopez, 301 Dennis Street, Trlr 186, Edmond, OK 73003.”** Additional searches in law enforcement databases showed eight (8) prior shipments to **LOPEZ** at the **PREMISES** from various shippers located in China, that had successfully passed through customs without inspection and were manifested as a mixture of auto parts, machine parts, camera parts, 3-D printer parts and a flashlight. These shipments ranged in date from April 13, 2024, to May 5, 2024. Some of these shippers

have been associated with multiple seizures of parcels addressed to other individuals containing machinegun conversion devices shipped from China to the United States.

9. On May 23, 2024, I confirmed that LOPEZ is not a licensed importer, licensed manufacturer, licensed dealer, or licensed collector based on a review of the "State Federal Firearms Listing" on the ATF website for the state of Oklahoma. I searched the list for Emanuel Lopez and/or 301 Dennis Street and did not finding any registered agents on the list.

10. Based on my training, experience, and conversations with other law enforcement officers, I am aware that:

- a. machinegun conversion devices convert semi-automatic firearms into firearms that fire multiple rounds on a single trigger press, and that machinegun conversion devices are commonly referred to as "Glock switches" when they are designed to be affixed to Glock model handguns;
- b. shipments of illegal machinegun conversion devices are often manifested as other legal items with low monetary value in an effort to circumvent U.S. customs inspections;
- c. machinegun conversion devices can be manufactured in a short period of time by 3-D printers, and many 3-D printer parts are

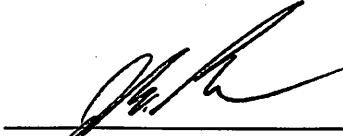
sourced from China;

- d. individuals engaged in the business of selling illegal firearms frequently store these items in their own residences, as well as in safe houses, to avoid detection by law enforcement;
- e. individuals engaged in the business of selling illegal firearms often maintain books, records, receipts, notes, ledgers, money orders, and other papers relating to the transportation, ordering, sale, and distribution of these items in their residences, safe houses, and on their electronic devices;
- f. individuals engaged in the business of selling illegal firearms commonly take photographs of themselves, their associates, and their items, and that these individuals usually maintain these photographs in their possession and at their residence.

CONCLUSION

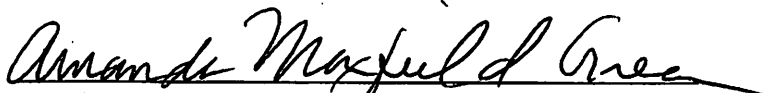
Based on the above information, I submit that there is probable cause to believe that violations of 18 U.S.C. §§ 922(a)(4) and (o) have occurred, and that evidence, fruits, and instrumentalities of these offenses are located at the **PREMISES**. Therefore, I respectfully request that this Court issue a search warrant for the **PREMISES**, described in **Attachment A**, authorizing the seizure of items described in **Attachment B**.

Respectfully submitted,



JOSHUA DICKSON
Special Agent
Homeland Security Investigations

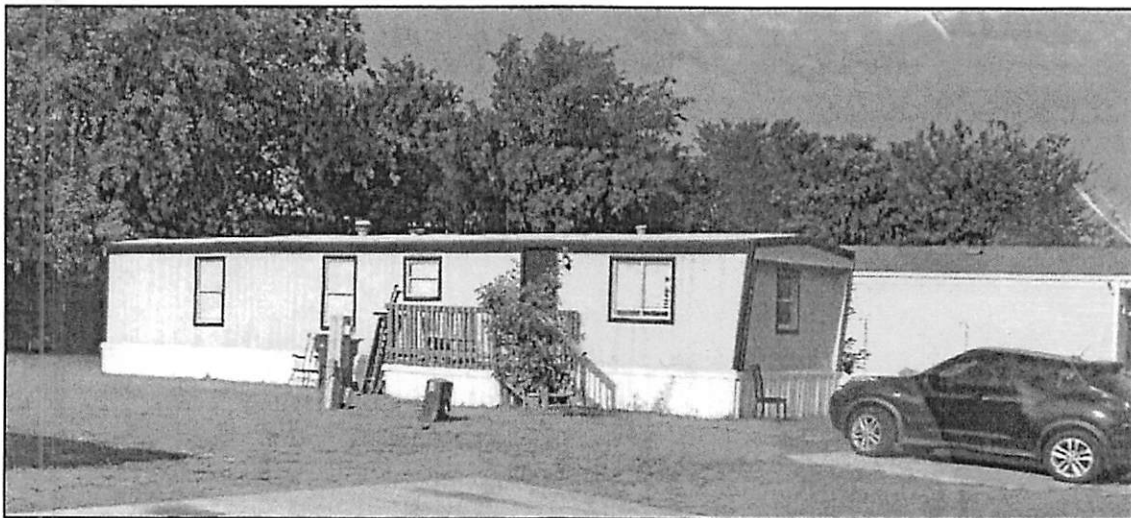
SUBSCRIBED AND SWORN to before me this 31st day of May 2024.



AMANDA MAXFIELD GREEN
United States Magistrate Judge

ATTACHMENT A

The property to be searched is located at **301 Dennis Street, Trailer 186, Edmond, Oklahoma 73003**. The primary location to be searched is further described as a white single story mobile home with dark trim and the number "186" affixed to the street side of the residence to include all appurtenances and vehicles located on the property. The residence is shown below.



ATTACHMENT B

DESCRIPTION OF EVIDENCE TO BE SEARCHED FOR AND SEIZED

1. Evidence relating to violations of 18 U.S.C. §§ 922(a)(4) and (o), specifically:

- a. machineguns, machinegun conversion devices, and firearms to which machinegun conversion devices may be readily attached;
- b. items which tend to show dominion and control of the property searched, including, but not limited to, utility bills, telephone bills, correspondence, rental agreements, property tax payment records, receipts from the payment of insurance premiums on the residence, photographs, and other identification documents;
- c. documents indicating the international shipment, possession, sale, receipt, purchase or barter for items in exchange for firearms or property, specifically ammunition packaging, containers, labels, receipts, and other items pertaining to the possession of firearms and machinegun conversion devices, including gun cases, ammunition magazines, holsters, spare parts for firearms, firearms cleaning equipment, photographs of firearms or of persons in possession of firearms, and receipts

for the purchase and/or repair of all these items;

- d. documents or literature related to the assembly, manufacture, and functioning of weapons and ammunition, including, but not limited to: books, pamphlets, drawings, sketches, diagrams, photographs, photocopies, and computer generated or computer stored information of the same information;
- e. tools and implements used in the firearm manufacturing process including, but not limited to: lathes, drills, drill presses, 3-D printers, computers, electronic tablets or cell phones to run computer-aided design software and other unspecified implements during the manufacturing process;
- f. records and documents which reflect the sale, trade, pawn, receipt or disposition of any firearm, buyer lists, seller lists, books reflecting the value of firearms and or notes, cryptic or otherwise, pay-owe sheets, records of sales, log books, ledgers, documents and photographs which reflect relationships between identified and/or unidentified co-conspirators to include personal telephone/address books, including electronic organizers and rolodexes, and financial instruments such as pre-pay and/or bank debit cards, credit

cards, checkbooks, and any other financial instrument used to purchase goods and services, to include bulk amount of U.S. and foreign currencies; and

- g. any digital storage medium including, but not limited to, cell phones, digital cameras, computers, compact discs and flash drives, as broadly defined by 18 U.S.C. § 1030(e)(1), used to facilitate the above-listed violations or containing evidence falling within the scope of the foregoing categories of items to be seized, searched, and forensic copies thereof.

The term “computer” includes all types of electronic, magnetic, optical, electrochemical, or other high speed data processing devices performing logical, arithmetic, or storage functions, including desktop computers, notebook computers, mobile phones, tablets, server computers, and network hardware.

The term “storage medium” includes any physical object upon which computer data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and other magnetic or optical media.